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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

NO. C 420 153

CHURCH OF SCIENTOLOGY OF *
CALIFORNIA *
VS. *
GERALD ARMSTRONG, et al *
AND RELATED CROSS ACTION *

THE CONTINUATION OF THE
DEPOSITION OF GERALD ARMSTRONG, taken pursuant
to Notice under the California Rules of Civil
Procedure, before Michelle Rock, a Notary Public and
Certified Shorthand Reporter in and for the
Commonwealth of Massachusetts at the offices
of Geller & Weinberg, 80 Boylston Street,
Boston, Massachusetts, on October 30, 1986 commencing
at 2:10 p.m.

1 organization, I think makes therapy real
2 difficult. It's like a guy out on the
3 battlefield and saying how come you're worried.

4 Q. Does that also apply to your physical
5 ailments?

6 A. Well --

7 Q. Do you believe that it makes any sense
8 to treat them until after your litigation is
9 completed?

10 A. Well, in a way that's the way I feel
11 about them too. I feel like it will end one
12 day, one way or another. And, when that
13 happens, then I have to regroup and totally restructure
14 my life, my body, my mind.

15 Q. You said when you -- settlement, you
16 will feel okay, and then something happens to
17 destroy, to show you that Scientologists are
18 not negotiating in good faith. Do you recall
19 that testimony?

20 MR. FLYNN: That's so
21 mischaracterized.

22 Q. Did you say something to that effect
23 or not?

24 A. Well, what I was saying, we were

1 discussing whether or not Gerald Armstrong was
2 one way, just a constant emotional tone
3 through time, I gave that as an example of
4 those times when suddenly it looks like maybe
5 this thing can end. But, those fleeting times
6 were dashed by what in my opinion, and in my
7 observation was that bad faith negotiation of
8 the organization. They have interposed in
9 each time that settlement has been discussed,
10 conditions that make it absolutely impossible,
11 and which evidence their malevolent intent.

12 Q. Who have you discussed your nausea
13 with?

14 A. You.

15 Q. Anybody else?

16 A. Yes, Joslyn. I don't know who, you
17 know.

18 Q. Who have you mentioned your
19 convulsions to other than me?

20 A. Lot of people.

21 Q. Who?

22 A. Mike, my lawyer.

23 Q. You mean Mike Flynn, your lawyer?

24 MR. FLYNN: Don't talk --

1 A. Okay, I never said anything to Mike.

2 MR. FLYNN: No, I'm just
3 telling you don't talk about conversations
4 that we had, that's all.

5 Q. Who have you talked about it with?

6 A. God, I hate to give you guys any names.

7 Q. Well, this is a lawsuit that you've
8 filed Gerry, I'm just trying to get some
9 discovery. Who did you talk about the
10 convulsions with?

11 A. Well, I guess the person who has seen
12 as many convulsions as anyone else, and has
13 you know, wethered them I guess, is sweetheart
14 I had up in Portland, Oregon.

15 Q. Did she see any of your convulsions?

16 A. Yes.

17 Q. How many?

18 A. I couldn't tell you.

19 Q. Was it more than ten?

20 A. I couldn't tell you.

21 Q. Could be as many as ten?

22 A. Yes. I mean that period of time, I
23 was just in this bottomless depression.

24 Q. Was that the worst time since you left

1 the Church?

2 A. The absolutely worst time, yes. Well,
3 that was -- No, the worst time was before I
4 become involved with her. It was during that
5 time, that two weeks or so that I was on the
6 stand.

7 Q. And, you became involved with her
8 shortly after that?

9 A. Yes.

10 Q. And, you were still feeling pretty bad?

11 A. Yes, it went on, well, it went on --
12 there was like a slight hiatus, is that a
13 correct word? Well, sometime after my arrival
14 in Boston, it sort of let go, but then it
15 picked up again.

16 Q. You discussed with her your physical
17 ailments, the woman in Oregon?

18 A. You know, it's real possible.

19 Q. Do you think you may not have
20 discussed your physical ailments with your
21 sweetheart in Oregon?

22 A. I don't know, I mean the physical --
23 I mean the physical ailments, the convulsions,
24 the incredible depression, the anguish, all of

1 that stuff?

2 Q. Yes.

3 A. Oh yes, a lot.

4 Q. Did you discuss your eating problems
5 with her?

6 A. I think she was fairly aware, you know,
7 she took real good care of me, and she fed me
8 during that period.

9 Q. Did you speak intimately with her
10 about your ambitions, concerns, and worries?

11 A. I would say yes.

12 Q. What's her name?

13 A. You already know her name, Debra.

14 Q. Debra?

15 A. Debra.

16 Q. Debra what?

17 A. That's it, that's all I called her,
18 Debra.

19 Q. You know her last name, don't you?

20 A. Yes.

21 Q. Where is she located?

22 A. Florida.

23 Q. Where in Florida?

24 A. Oh come on, somewhere in Miami.

1 Q. Do you have her address?

2 A. I think so.

3 Q. Will you produce that for us?

4 A. No.

5 Q. Did you have any contact with her in
6 the last couple of weeks in person, or by
7 phone, or by mail?

8 A. Yes.

9 Q. When was your most recent contact?

10 A. Last night.

11 Q. Do you talk with her on a regular
12 basis?

13 A. No.

14 Q. Who called whom last night?

15 A. I called her.

16 Q. You're still friends?

17 A. Yes.

18 Q. What town is she in in Florida?

19 A. I think Miami.

20 Q. She works for an attorney?

21 A. As far as I know, yes.

22 Q. What attorney is that?

23 A. I don't know.

24 Q. Will you produce that for us, Mike,

1 that address to consider whether she would be
2 an important witness?

3 A. She's not.

4 MR. FLYNN: I'll let you
5 know.

6 Q. Is she an attorney?

7 A. Yes.

8 Q. Is she a member of the Florida Bar, do
9 you know?

10 A. Yes.

11 MR. BLUMENSON: And, you're
12 going to let us know? I didn't hear.

13 MR. FLYNN: You've probably
14 got enough to get her now.

15 A. You've got that -- what's that guy
16 you got down there, Mueller, right? He works
17 down there in Miami. One of your guys should
18 be able to track down a practicing attorney.

19 Q. I want an answer to the question.

20 MR. FLYNN: You don't need
21 an answer.

22 MR. BLUMENSON: I don't know
23 her address, I don't know who knows her
24 address if anybody, I'm asking you for it.

1 You can either refuse, or you can say you'll
2 give it us later or you can say you'll think
3 about it, but why don't you make the record
4 clear on it.

5 MR. FLYNN: Next question.

6 MR. BLUMENSON: You won't do
7 any of those things?

8 MR. FLYNN: Next question.

9 MR. BLUMENSON: I take that
10 as a refusal.

11 MR. FLYNN: You can take it
12 any way you want. It's like asking what Roger
13 Geller's address is, even if you don't know it
14 you could look it up in the -- in many
15 publications. Right Roger?

16 MR. GELLER: Do you know
17 where I live?

18 Q. Prior to joining the Church or hearing
19 about Scientology, did you ever commit an act
20 of prostitution.

21 MR. FLYNN: Don't answer
22 that. Next question.

23 Q. Do you have homosexual experience?

24 MR. FLYNN: Don't answer

1 that. Next question.

2 Q. Were you a homosexual before you
3 joined the Church?

4 MR. FLYNN: Don't answer
5 that.

6 Q. Did the Church of Scientology cure you
7 of homosexuality?

8 MR. FLYNN: Next question.
9 Don't answer that.

10 Q. Did the Church of Scientology cure you
11 of drugs?

12 MR. FLYNN: Don't answer
13 that.

14 Q. Did the Church of Scientology --

15 MR. GELLER: Is there a
16 reason that you're --

17 MR. BLUMENSON: No, he's
18 made his record clear.

19 Q. Did the Church of Scientology cure you
20 of criminal behavior or tendencies?

21 MR. FLYNN: Don't answer
22 that.

23 Q. Did the Church of Scientology --

24 MR. FLYNN: I'll tell you

1 what, I'll let you ask him if the Church of
2 Scientology cured him of anything. I'll let
3 you ask that broad question. Okay?

4 MR. BLUMENSON: I'm going to
5 choose the questions.

6 MR. FLYNN: If you want,
7 I'll ask him. Did the Church of Scientology
8 cure you of anything?

9 MR. BLUMENSON: You've got
10 your turn at the end of my examination.

11 MR. FLYNN: Would the answer
12 be no?

13 A. Answer would be no.

14 MR. FLYNN: Okay, the record
15 is clear. All the rest does is give you any
16 latitude to pry into his personal life.

17 MR. BLUMENSON: Well, I have
18 a right to examine this witness, Mr. Flynn,
19 and one of the things I can examine him on in
20 my opinion is whether he committed crimes
21 before he joined, and whether the Church of
22 Scientology cured him of criminal behavior or
23 tendencies; whether he was a homosexual before
24 he joined, and whether the Church of

1 Scientology cured him of that; whether he was
 2 a prostitute before he joined or committed
 3 acts of prostitution before he joined, and
 4 whether the Church of Scientology cured him of
 5 that. And, your conclusionary question and
 6 answer does not sufficiently substitute for my
 7 rights of discovery, and you know that. But,
 8 if you want to insist --

9 MR. FLYNN: I know what I
 10 know, you don't have to tell me. You've got
 11 the record, and the record is clear. You do
 12 not have the latitude, Mr. Blumenson, to pry
 13 into matters that are none of your business.
 14 Whether he was a member of the Hopi Indians
 15 and believes in marijuana, that is irrelevant
 16 for the purposes of this litigation.

17 MR. BLUMENSON: Then you
 18 ought to take another look at this Complaint,
 19 Mike.

20 Q. Did you sell drugs prior to joining
 21 the Church of Scientology?

22 MR. FLYNN: Don't answer.

23 Q. Isn't it a fact that you sold ten
 24 grams of hashish in the spring or summer of

1 1969?

2 MR. FLYNN: Don't answer.

3 Q. Isn't it a fact that you sold
4 mescaline to friends of yours in the summer of
5 1969?

6 MR. FLYNN: Don't answer.

7 Q. Isn't it a fact that until you joined
8 the Church of Scientology you were a drug
9 seller?

10 MR. FLYNN: Don't answer.

11 Q. Isn't it a fact that after you joined
12 the Church of Scientology that you never sold
13 drugs?

14 MR. FLYNN: Don't answer.

15 Q. What statements do you say were
16 revealed in violation of confidence from your
17 auditing folder to third persons?

18 A. Well, without revealing those ones, I
19 can give you a list of the dates --

20 Q. No. I want to know, you have
21 complained that certain confidential
22 information was revealed to certain persons.

23 MR. FLYNN: His whole
24 auditing file was culled, that's our position.

1 So there is no misunderstanding at the trial
2 our position is that his entire auditing files
3 were culled with everything that's in it,
4 regardless of the contents of what's in it, by
5 the guardians office, and by intelligence
6 officers of the Church for use by them and by
7 the private investigators and by its'
8 attorneys, that's our position, without regard
9 to the contents of any specific file.

10 MR. BLUMENSON: We have a
11 right to inquire into your position. We have
12 to prove that your position is wrong. And,
13 the first question is, what information was
14 given to a third person that you have placed
15 in your Complaint? You have said confidential
16 information was given to third persons, I'm
17 asking what that confidential information was.

18 MR. FLYNN: The information
19 in the auditing files. Next question.

20 Q. Well, did you see any of this
21 confidential information used at any time
22 after you left the Church by somebody who
23 wasn't authorized to have it?

24 MR. FLYNN: You can answer

1 that.

2 A. Yes.

3 Q. And, what's the most recent example?

4 A. You're asking these questions right
5 now which were obtained from pre-clear folders.

6 Q. The question I asked about whether you
7 were a prostitute, that's from your P.C.
8 folder?

9 A. You are not going to find that
10 language in there, that's your construction of
11 whatever the incident was. So, you label it
12 however you want to. But, wherever the
13 initial -- the first time you'll ever find
14 any mention of anything like that from Gerald
15 Armstrong is in my supposedly confidential pre-clear
16 folders, where I'm the absolutely sitting duck
17 controlled pre-clear bearing his -- you know,
18 perhaps not totally brilliantly clear soul,
19 but nevertheless his soul, and telling
20 whatever it is. That's where it first
21 appeared.

22 Q. I'm not asking where it first appeared.

23 A. That's --

24 Q. Where did I get it from, your

1 confidential folder?

2 A. You got it from those third parties
3 who took it out of my pre-clear folder.

4 Q. So, the only source of it was the
5 pre-clear folder?

6 A. The only source of it is the memory of
7 Gerald Armstrong and the statements made in
8 trust to that organization. That's the source
9 of it.

10 MR. FLYNN: It's clear to
11 anyone who ever looks at any of these issues
12 that all of your information on any personal
13 or intimate aspect of an individual's life
14 come from these folders. Anyone who has ever
15 looked at these issues, it's as blatant as the
16 sun coming up in the morning.

17 MR. BLUMENSON: You think I
18 have a right to ask questions when you put
19 that in the Complaint?

20 MR. FLYNN: I think you have
21 a right to ask some questions.

22 MR. BLUMENSON: And, that's
23 what I intend to do right now.

24 A. So, your position is that the rapist,

1 in order to prove his case, gets to fuck the
2 victim? Give me a break.

3 Q. Gerry, here's what I want to ask you --

4 A. You've been asking me to legitimize
5 the details which you've illegitimately taken
6 from my pre-clear folders. I may be crazy, but
7 I'm not stupid.

8 Q. Okay, I just want to ask you --

9 MR. FLYNN: He happens to be
10 exactly correct.

11 Q. Did you tell anyone other than your
12 auditor, if you told your auditor, that you
13 had had homosexual sex for pay?

14 A. Mr. Blumenson, to reiterate that,
15 everything which I have said or written was
16 within that same context of offered --

17 Q. I'm asking this particular issue.

18 A. Oh shut up, listen to me. Of offered,
19 guaranteed, promised trust by that
20 organization. We will never -- man has so
21 often been betrayed, we will never -- Come
22 on, the guy was sitting there counting his
23 -- running his diamonds through his hands,
24 his gold bars, while blood dripping from his

1 fangs as he is reading through people's
2 pre-clear folders. And, you can tell that
3 from the L. Ron Hubbard Goodrich Eval.

4 Q. Listen --

5 A. Same technique was used on Goodrich as
6 used on Armstrong, the same G.O. mentality.
7 You're trying to legitimize this thing through
8 documents that were raped, stolen from my mind,
9 because I had offered those things in that
10 context of trust. I'm not going to talk about
11 it, you go screw yourself.

12 Q. Let me just say something now, I
13 believe it's an issue Q.--

14 MR. FLYNN: Want to take a
15 break here?

16 A. No, I'm fine.

17 Q. Did you, I want to be specific on the
18 issue I have raised, not that everything I
19 know comes from your auditing file, I want to
20 know --

21 MR. FLYNN: You're so
22 offensive it's beyond belief. Can't you see
23 what this subject does to the witness? If you
24 want to know --

1 MR. BLUMENSON: Mike, you
2 should never have put it into your Complaint
3 that personal information was disseminated to
4 third parties.

5 MR. FLYNN: That's what your
6 organization, and your founder were famous for,
7 this precise thing.

8 MR. BLUMENSON: Look, there
9 are two important things in this context, one
10 is --

11 MR. FLYNN: Yes, asking him
12 about --

13 MR. BLUMENSON: Wait a
14 second. One is whether Scientology helped or
15 hurt him, damaged him or helped him, that's
16 definitely an issue. The second issue is
17 whether Scientology took confidential
18 information from auditing files and
19 disseminated it to third persons, which
20 apparently means that there has to be an issue
21 as of evidence as to that, what information
22 was given, who was it given to and so on. My
23 only motive in asking these questions is on
24 those two elements. Now --

1 MR. FLYNN: I wouldn't
2 believe your motives as you stated them, Mr.
3 Blumenson, for all the tea in China.

4 MR. BLUMENSON: I'm not
5 going asking you to believe me, I'm not even
6 asking you not to insult me any more, I'm just
7 asking you to let me conduct this deposition
8 in a professional manner.

9 Q. Now, my question is specific, and the
10 question is did you tell anyone, after you
11 joined the Church did you tell any
12 Scientologists about an experience of
13 homosexual experience, sex for pay prior to
14 your entry into the Church outside of auditing?

15 A. Outside of --

16 MR. FLYNN: Let's say
17 outside of confidentiality.

18 MR. BLUMENSON: No, I'm
19 deciding the questions.

20 MR. FLYNN: I'm telling you
21 that the word auditing means confidentiality.

22 MR. BLUMENSON: Well, I'm
23 sorry Mike, that is not for you to change the
24 questions or to give the answers. You know,

1 we're going to have to go to court over so
2 many of these things needlessly.

3 Q. Now, did you tell any Scientologists
4 about homosexual sex for pay prior to your
5 entry into the Church outside of an auditing
6 session?

7 MR. FLYNN: That means
8 outside of confidentiality.

9 A. No.

10 Q. Now, did you say it outside of an
11 auditing session --

12 MR. FLYNN: That means
13 confidentiality.

14 MR. BLUMENSON: I think that
15 we may have to go to court and I'm going to
16 take a one minute break to consult. We may
17 have to go to court right now. This is totally
18 outrageous behavior. I get to ask the
19 questions Mike, you get to cross-examine later.
20 You don't get to revise the questions
21 consistently like that.

22 MR. FLYNN: Let me know.

23 (Discussion held off the
24 record.)

1 MR. FLYNN: Kindly on the
2 record refrain from any further emotional
3 outbursts against my client, Mr. Blumenson.

4 MR. BLUMENSON: I don't know
5 what you're talking about Mr. Flynn. I find
6 your conduct offensive, I find it totally
7 obstructive, and I've been asking these
8 questions in good faith.

9 Q. Now, I want to know whether you --
10 you said that the only times that you talked
11 about homosexual acts for pay to
12 Scientologists was in confidentiality,
13 remember that question and answer?

14 A. Well, you're talking, you have
15 pluralized what is probably listed even on
16 your sheet as a single act. So, I would have
17 to have some objection to the way you worded
18 that.

19 Q. Okay, a single act of homosexual sex
20 for pay.

21 A. That is out of my pre-clear folders.

22 Q. Did you ever write it or say it to
23 someone outside of the pre-clear folders?

24 MR. FLYNN: I object. I

1 don't know what that means. The issue is
2 confidentiality, not isolation to the
3 pre-clear folder.

4 Q. How do you know it's in your pre-clear
5 folders?

6 A. Well, just going on your admissions,
7 just going on the organizations admissions
8 that it's in my pre-clear folder.

9 Q. I didn't tell you it was in your
10 pre-clear folder, did I?

11 A. No, but other attorneys of record on
12 this case have, people who culled my folders,
13 Long, and whoever the other rest of the people
14 were that did this act, listed all of these
15 things in this document, and it's one of these
16 items here which is blacked out.

17 Q. Did you see it before it was blacked
18 out? I mean, you're looking at what, the
19 objections, correct?

20 A. Correct.

21 Q. The objections on the production of
22 the P.C. file. Did you see it in those
23 objections at some point?

24 A. I think I've already said that. If in

1 your contorted way you're attempting to get
2 statements, you know, you're attempting to
3 legitimize that criminal act, it isn't going
4 to work, and I'm not going to fall for it. So,
5 any discussion of this subject matter, and
6 there is no admission that it even happened,
7 but it came from my pre-clear folders.

8 Q. Did you tell that information about a
9 homosexual act for pay prior to your entry to
10 Scientology, did you tell that to anyone who
11 was not an auditor?

12 MR. FLYNN: It's on the
13 record that he only gave it in confidence. So,
14 don't answer any other questions about it.

15 MR. BLUMENSON: Wait a
16 second Michael, what you're doing is
17 outrageous and totally unprofessional. I'm
18 asking a question that's highly relevant. The
19 question is, was that fact a product of
20 culling of confidential files, or was it
21 obtained in another way. You have placed that
22 in issue, and I have a right to question, and
23 you are not permitting me to question except
24 by changing my question with your own

1 interruptions.

2 MR. FLYNN: If you want to
3 go to Judge Breckenridge and get an order, do
4 so. Judge Breckenridge tells us to answer, we
5 will. Next question.

6 Q. Is everything that you say in
7 Scientology to a Scientologist confidential?

8 A. Well, I would say no to that.

9 Q. Okay. What written pledges are there
10 of confidentiality of Scientology that you saw?

11 A. It's throughout the whole literature.
12 We have no interest in what you've done before,
13 it will never be held against you as long as
14 you tell the truth.

15 So, you tell the truth and a
16 little while later here the same document
17 comes back to haunt you, given in trust, that
18 trust violated. That trust was obtained by
19 fraud to begin with by promises of confidentiality,
20 by promises of honesty ethics, et cetera, and
21 it's violated.

22 Q. All right, what written documents
23 promised you that statements that you made
24 would not be repeated to third parties?

1 A. I will be able to find it within your
2 own literature.

3 Q. Well, tell me to the best of your
4 recollection what they are?

5 A. Basically what this statement is. We
6 have no --

7 Q. Auditors code?

8 A. Well, the auditors code is certainly
9 part of it.

10 Q. Is there any other document that
11 promises confidentiality?

12 MR. FLYNN: Don't yell at my
13 client.

14 MR. BLUMENSON: I'm not
15 yelling.

16 A. The answer is yes.

17 Q. Is there any -- and what document is
18 it?

19 A. I can find it.

20 Q. Can you tell me the gist of the
21 document?

22 A. What I've told you before. We have no
23 interest in what you've done before, it won't
24 be used against you. The only problem you're

1 going to have is if you don't tell.

2 So you tell, and you get it,
3 you get it from a guy like you sitting across
4 this table.

5 Q. Does that document purport to say that
6 it's not going to be given to a third person,
7 the one that you're referring to now that you
8 can't name?

9 A. What the document purports, what the
10 body of Scientology which is given to the
11 uninitiated as they move up the toll bridge is
12 that whatever you say to us, it will never be
13 used against you. We have no interest in
14 prior indiscretions. We have no interest in
15 those things. Those things will never be used
16 against you. Your trust has been violated in
17 the past, that's why you're here with us now,
18 we'll never betray you. That's the gist of the
19 promises of Scientology.

20 The truth is, it's a
21 criminal organization operated by criminals
22 who will use anything, anything which they can
23 construe , and you do construe it as smut, you
24 do want to use it against me.

1 Q. Did you talk about your homosexual
2 experience for pay with your family?

3 Is that a refusal to answer,
4 or do you wish more time?

5 A. No, I'm trying to make sense of the
6 question.

7 Q. Did you tell anyone in your family
8 that you had had sex with a man for pay prior
9 to 1969?

10 MR. FLYNN: Don't answer
11 that.

12 A. The answer is no.

13 MR. BLUMENSON: This
14 information is directly at issue from your
15 Complaint.

16 MR. FLYNN: He answered it.

17 Q. The answer is no?

18 A. Correct.

19 Q. Did you tell any non-auditor that
20 information?

21 MR. FLYNN: This is the same --

22 MR. BLUMENSON: I want an
23 answer to that question. I consider it key to --

24 MR. FLYNN: His testimony is

1 he only gave this information in confidence to
2 the Church of Scientology.

3 MR. BLUMENSON: That's what
4 you have coached him to say by refusing to
5 allow any other terminology in the question.
6 I have asked my own question and you won't let
7 it get answered.

8 A. Listen, you keep making this
9 allegation that he's coached me and he's never
10 coached me.

11 MR. BLUMENSON: Gerry, the
12 question is ridiculous. I say, did you say it
13 in auditing, he won't let you answer it. And
14 says no, for auditing read confidentiality.

15 MR. FLYNN: You should get a
16 lawyer who can ask questions.

17 A. You want to know my status on this --

18 MR. BLUMENSON: I want to
19 know whether he said it outside of auditing,
20 and I'm not going to be satisfied until I get
21 an answer to it.

22 A. I'll give it to you, I've never said,
23 never discussed it with anyone outside of the
24 Scientology context.

1 Q. Yes, but in Scientology did you say it
2 in auditing only, or did you say it in non-auditing
3 as well as some other context?

4 A. In the same context.

5 Q. In auditing only?

6 A. Listen, if you think --

7 Q. You know what a session is, an
8 auditing session, right?

9 A. Tell me this --

10 MR. FLYNN: This is such an
11 outrage. This is so outrageous, Mr. Blumenson,
12 it's beyond belief.

13 A. The promises which were made of trust
14 and confidentiality, and we don't care what
15 you've done before. Do you think --

16 Q. I'm not asking about confidentiality,
17 let's put that aside. I'm not asking a single
18 question about confidentiality here, I'm
19 asking a factual question. Did you say --

20 MR. FLYNN: Please don't
21 raise your voice.

22 Q. Did you talk about this incident of
23 homosexual sex for pay outside of an auditing
24 session?

1 MR. FLYNN: It's been asked
2 and answered.

3 MR. BLUMENSON: It has not
4 been answered, and I've been trying my hardest
5 to get an answer.

6 MR. FLYNN: In the previous
7 context it's been asked and answered.

8 MR. BLUMENSON: It has not,
9 I don't regard --

10 MR. GELLER: He's going to
11 answer the question.

12 A. The answer is no. Now, hold on --

13 MR. BLUMENSON: That's all I
14 wanted to know.

15 A. Now, I know and you know that you have
16 a document down there, possibly typed by me,
17 in which you have that line, because the G.O.
18 wanted that for what purpose, for clearance to
19 go to S.U., not for -- not for future
20 litigation. S.U., capital S, capital U.

21 Q. So, you gave that information not only
22 in auditing, but on a G.O. application, is
23 that correct?

24 MR. FLYNN: No.

1 Q. Outside of sessions, is that correct?

2 MR. FLYNN: The answer is
3 the G.O. had the information in their own
4 files, and it was transposed to another file.

5 MR. BLUMENSON: I'm not
6 asking you for the answer, Mr. Flynn.

7 MR. FLYNN: It was given in
8 confidence, Mr. Blumenson.

9 MR. BLUMENSON: This is a
10 total abuse, you're trying to obscure, and
11 obstruct an obvious major issue in this case,
12 you're trying to destroy and abuse discovery
13 Mr. Flynn. And, you're laughing now, but it's
14 not funny. What you're engaging in is two big
15 shenanigans. It's ridiculous, it's a total
16 disruption of this deposition.

17 MR. FLYNN: Mr. Blumenson,
18 number one, please stop yelling at me.

19 MR. BLUMENSON: I'm not
20 yelling at you, and I'm trying to conduct this
21 in a professional manner.

22 MR. FLYNN: Then go back to
23 law school and learn how.

24 MR. BLUMENSON: Well, I've

1 never at a deposition been in a situation
2 where I can't ask a question without you
3 rephrasing the question, and forcing the
4 witness to answer not my question but what you
5 want the question and answer to be.

6 MR. FLYNN: Please stop
7 yelling.

8 MR. BLUMENSON: We're going
9 to take a five minute break.

10 A. And, I want to put on the record that
11 Mr. Flynn has never forced me to say anything.
12 He has never -- if he ever suggested
13 anything, I clearly evaluate that against the
14 data that I have. He does not feed me answers,
15 he does not feed me legal theories, he does
16 not feed me a way to live my life.

17 MR. BLUMENSON: All right,
18 let's sit down, and we'll now resume.

19 A. It's just not right.

20 MR. BLUMENSON: I'm not
21 saying that you're forced to do anything, I'm
22 saying that Mr. Flynn, and Mr. Tabb yesterday
23 totally abused this by feeding answers which
24 you may or may not have adopted. I'm not

1 impugning your integrity Gerry, I think the
2 conduct of your attorney has been outrageous.

3 A. If my integrity is not being impugned
4 here, then what is?

5 MR. BLUMENSON: That's going
6 to be for the jury to decide, it's not for me
7 to decide. What the problem is the gross, the
8 absolutely grotesque violation of rules of
9 court which this is supposed to be conducted
10 under. I have never seen in court or any
11 other deposition a situation where a lawyer's
12 question is blocked by the other counsel who
13 replaces which he doesn't like with other
14 words. I've never seen a situation where a
15 lawyer's question is answered in a whisper by
16 the lawyer on the other side to the witness.
17 These kind of things have no place in
18 deposition, they're a waste of time, they're
19 an obstruction, they're unprofessional,
20 they're totally unethical and they're a
21 subordination of perjury if Mr. Armstrong rose
22 to the bait.

23 MR. FLYNN: For the record,
24 we're obviously -- since Mr. Blumenson has

1 where he has given such statements, in order
2 to give a little specificity to the question,
3 I would submit that you bring those up. And,
4 if you have an individual like John Smith, or
5 whoever Mr. Armstrong may have said something
6 to, in order to refresh his recollection you
7 bring up the name John Smith.

8 But, to just arbitrarily go
9 on a fishing expedition in such a sensitive
10 area, which would be sensitive to anyone's
11 life, not only yours, but Mr. Armstrong, but
12 to anyone in this room with these broad
13 questions in the way that you have, is
14 completely inappropriate. It doesn't
15 recognize the subtleties in this particular
16 litigation in this particular area, and all of
17 your discovery can be completed with
18 appropriate questions, with sufficient
19 specificity to avoid and diffuse the problem
20 that we have.

21 Q. Did you ever tell anyone other than an
22 auditor that you sold drugs prior to your
23 joining Scientology?

24 MR. FLYNN: That is just

1 such a specific violation of what I just
2 suggested to be a good procedure.

3 MR. BLUMENSON: You are not
4 the judge.

5 MR. FLYNN: You are going to
6 have let the judge answer, we're going to put
7 their procedure before the judge.

8 Don't answer, next question.

9 Q. Do you believe that information as to
10 whether you sold drugs prior to joining
11 Scientology was taken out of your pre-clear
12 folders and revealed to third persons?

13 MR. FLYNN: You can answer
14 that.

15 A. Well, let me put it this way. Just so
16 that, you know, again, you're hoping that by
17 putting this on the record in this way you can
18 go down the list of items which have been
19 culled from the pre-clear folders to
20 legitimize it. Right? Because here it is,
21 here's Armstrong talking about it in the
22 deposition, so it can be appear in Freedom, or
23 the latest television show, or, you know, when
24 Gerald Armstrong does become -- does make

1 his million and does become famous as a writer
2 and artist, you can have it surface then,
3 right?

4 Q. Gerry, I'm only responding to a
5 Complaint that you have filed in which you
6 claim as one of your major counts that
7 confidential information was obtained from
8 your pre-clear files and used against you, and
9 I'm going to get to the bottom of that.

10 Either we're going to stipulate that cause of
11 action away, or I'm going to ask questions
12 about it. And, no matter how much obstruction
13 Mr. Flynn puts into this case, it's going to
14 have to be answered sooner or later.

15 Q. Is the drug sale issue one of those
16 things which you're claiming was obtained from
17 the P.C. file and used against you?

18 A. Anything that has to do with drugs,
19 sales of drugs, all of those things, yes. I'm
20 going to hand you a copy of what the
21 organization -- you know, you claim, let's
22 drop the cause of action, or whatever it is
23 about the culling of pre-clear files.

24 Q. I said if you don't drop it I'm going

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1 to ask it. If you do drop it, then there is
2 no need to ask you --

3 A. Okay, then I'm going to give you the
4 product, and I've deleted those things,
5 because they're not necessary in order to
6 prove the fact of the culling. There are
7 admissions here: October 16, 1977, and I thank
8 Mr. Randall for using the term Minister,
9 Armstrong informs his Minister that --
10 and, then Armstrong informed his Minister that
11 -- On September 2, 1977, Armstrong confessed
12 to his Minister that -- on May 5, 1977,
13 Armstrong informed his minister that --

14 Q. Gerry --

15 A. On February 20, 1977 Armstrong
16 informed his minister that -- on February 26,
17 1977 Armstrong described the -- Armstrong
18 admitted to his Ministers on numerous
19 occasions that -- See examples, March 26,
20 1970 and July 16, 1970 statements.

21 Q. Can I ask you now -- That's in the
22 case, it's filed, there is no question about
23 that, you don't need to read it all.

24 The point I want to ask you

1 is, prior to that objection being filed on
2 July 3, 1986 in response to an order to
3 produce and index these files, prior to that
4 time --

5 A. In response to an order to produce --

6 Q. Following an order to produce and
7 index the files.

8 A. So this is just as --

9 Q. Prior to July 3, 1986 when this was
10 filed -- Can I finish my question?

11 A. No, no, you can't finish your question.

12 Q. I'm going to rephrase the question.
13 Prior to July 3, 1986 when this order was
14 filed --

15 A. Hold on, that's not an order, that's
16 the objection.

17 Q. When this objection was filed.

18 A. Okay.

19 Q. Prior to July 3, 1986, when this
20 objection was filed, was information about
21 your drug sale history disseminated to other
22 people?

23 A. Yes.

24 Q. Was it disseminated to other people

1 with the information -- was the information
2 disseminated -- obtained from your pre-clear
3 file?

4 A. The totality of P.C. files were
5 disseminated to other people. What's in my PC.
6 file is in my P.C. file.

7 Q. Was the drug history obtained from
8 your P.C. file, is it encompassed in your
9 Complaint when you say --

10 MR. FLYNN: Do you have the
11 P.C. file?

12 MR. BLUMENSON: I do not
13 have the P.C. file, you have the P.C. file.

14 MR. FLYNN: Your clients
15 have the P.C. files, they can look Mr.
16 Blumenson so we can avoid this whole area.
17 They gave them to the court, they indexed them,
18 they looked at them, they obviously picked out
19 what they thought was juicy, titillating and
20 interesting to people such as yourself. They
21 wrote it down, they got the files, so they
22 know the answer to that question. So, why
23 cause problems?

24 Q. I want to know whether drug

1 information -- whether your Complaint in
2 which you say confidential information from
3 the P.C. file was disseminated to third
4 persons, does that include information about
5 your selling drugs disseminated to third
6 persons prior to July 3, 1986?

7 MR. FLYNN: You don't have
8 to answer. I'll tell you what exactly it
9 includes.

10 MR. BLUMENSON: No, I'm not
11 asking you --

12 MR. FLYNN: It includes
13 every word, comma, syllable, punctuation mark,
14 everything on the four square corners of the
15 P.C. file, everything that's in there which
16 you have possession of, that's the answer.

17 MR. GELLER: Mr. Flynn, are
18 you inviting us to take your deposition now?

19 MR. FLYNN: No, I'm inviting
20 you to, if you want to recull them, recull
21 them for purposes of figuring out what you've
22 already culled.

23 MR. BLUMENSON: Well, we
24 will in response to your invitation. But, I'm

1 trying to get some very basic information on a
2 basic claim that you have injected into this
3 case. And, the question is, did the -- are
4 you claiming that the only source of the drug
5 sale information which you say was
6 disseminated to third persons was the P.C.
7 file?

8 MR. GELLER: It's a simple
9 question.

10 A. Here's the way it works --

11 Q. No, I want an answer. Can you answer
12 that?

13 A. No. I can't answer that.

14 Q. Was it culled only from the pre-clear
15 file, or could it have been obtained from
16 another source?

17 MR. FLYNN: He said he
18 couldn't answer yes or no. Next question.

19 MR. GELLER: You said he
20 couldn't answer that.

21 A. I said it.

22 Q. I want to know --

23 A. Listen, you know, that's the way it
24 worked.

1 Q. I'm not asking you the way it worked.

2 A. No, I can't answer it.

3 Q. I'm not asking you for standard
4 practice, I'm not asking you for pattern of
5 practice, I'm asking you whether there was any
6 other source of information other than your
7 P.C. file which Scientologists had concerning
8 your drug sale history.

9 MR. FLYNN: He said he
10 couldn't answer.

11 MR. BLUMENSON: He did not
12 say that. There is a new question, this is a
13 new question.

14 A. The source, so that we don't have to
15 get into -- you know, the exacerbation or
16 the violation, I know what the intent is
17 regarding the hoped for disintegration of
18 Gerald Armstrong's psyche. But, everything
19 prior to Scientology, everything in my life
20 prior to Scientology, and a great deal in
21 Scientology is in those thousand, fifteen
22 hundred hours of auditing, virtually every
23 detail of my life from the -- from my
24 earliest recollection through time, up to

1 Scientology, that's the pre-clear folder. It
2 has every detail of my life.

3 Q. Is your G.O. application part of your
4 pre-clear folder?

5 A. The G.O. application is based on data
6 from the pre-clear folder.

7 Q. It was filled out by somebody taking
8 information out of the pre-clear folder and
9 putting on the G.O. application?

10 A. Same data.

11 Q. I'm not asking if it's the same data.
12 Was the G.O. application filled out by a
13 Scientologist going through your P.C. file?

14 A. I don't believe so.

15 Q. It was filled out by you, correct?
16 Can you answer that Gerry?

17 A. Well, as much as I can -- you
18 haven't produced it all, but that page --
19 you know, you're talking eleven years ago, and
20 it seems likely that I would have typed up
21 that thing for the application, it seems
22 likely that it's me.

23 Q. And, that's not what you would call a
24 P.C. file, that G.O. application, correct?

1 MR. FLYNN: That's not the
2 issue.

3 MR. BLUMENSON: I'm not
4 asking you what the issue is Michael.

5 MR. FLYNN: Well, I'm
6 telling you what the issue is.

7 MR. BLUMENSON: No, I don't
8 want to hear what your issues are.

9 MR. FLYNN: The issue is
10 that you construe P.C. file to mean
11 confidential data given. The answer is yes.
12 It includes every bit of information given in
13 the --

14 MR. BLUMENSON: You've made
15 your position clear.

16 Q. Now, is the G.O. Application
17 considered an example of a P.C. file?

18 MR. FLYNN: By definition,
19 yes.

20 MR. BLUMENSON: This is an
21 outrage. I'm asking the witness, not you.
22 You did this in the Dede Reisdorf deposition,
23 you did this a million times in Matt's
24 deposition. The courts have ruled that you

1 should not be answering these questions yourself
2 or obstructing depositions on numerous
3 occasions, Mr. Flynn. You've been warned so
4 many times, this record is so clear.

5 MR. FLYNN: Would you please
6 stop?

7 A. Perhaps I can help so that you can
8 understand --

9 Q. No, I want an answer to the question.
10 This is a deposition, question and answer. My
11 question is, is the G.O. application a part of
12 the P.C. file?

13 A. I would say that no, it properly
14 belongs in what was called the ethics file.

15 Q. Now, I'm going to ask you whether you
16 said to the G.O. or you told the G.O. on your
17 application that you had a history of drug
18 sale prior to coming to Scientology?

19 A. What I put on the application has no
20 -- you know, it was obtained the same way.
21 Your client represents that --

22 Q. Just asked you whether you did. I'm
23 not asking you how it was obtained. I'm
24 asking you, did you tell the G.O. in your

1 application for employment that you had sold
2 drugs prior to 1969?

3 A. I had filled out an application, I do
4 not have it here, and we've already discussed
5 this subject. And, regardless just think
6 about it, regardless, even in ethics file you
7 guys represent that the ethics files are
8 confidential.

9 Q. Where does that appear?

10 A. I have a statement from one of your
11 attorneys.

12 Q. When were you first told the ethics
13 files were confidential?

14 A. When I first got into Scientology.

15 Q. Who told you that?

16 A. Well, it's within the literature,
17 virtually everyone that I ever talked to on
18 the subject of confidentiality and trust gave
19 me the words and the impression that
20 everything that you say, write, whatever, when
21 you're here will never be used against you and
22 that it's given in absolute trust, after all
23 your trust has been violated so many times in
24 the past.

1 MR. FLYNN: Mr. Blumenson, I
2 would call on you to use your common sense.
3 Do you think that the type of information that
4 you have been spewing forth is the type of
5 thing that people commonly go around telling
6 every Tom, Dick and Harry that they know?

7 MR. BLUMENSON: Let's not
8 have unnecessary colloquy, okay?

9 MR. FLYNN: What it kind of
10 conveys --

11 MR. BLUMENSON: I don't want
12 a lecture from you --

13 MR. FLYNN: -- is the
14 absurdity of this whole line of questioning.

15 MR. BLUMENSON: I don't want
16 a lecture from you, I just want to ask
17 questions and get answers.

18 MR. FLYNN: The proof is in
19 the pudding.

20 Q. Did you ever invoke a committee of
21 evidence on some grievance you had?

22 A. You'd have to refresh my memory.
23 Invoke a committee of evidence --

24 Q. Did you ever seek to have a committee

1 of evidence rule on something involving you?

2 A. Are you talking about a review com.
3 ev.?

4 Q. Let's say review com. ev., did you
5 ever invoke a review com. ev.?

6 A. I requested one.

7 Q. Did you go through a committee of
8 evidence?

9 A. Review com. ev.

10 (Discussion held off the
11 record.)

12 Q. You complained in your Complaint
13 paragraph 24, Mr. Armstrong -- Can I have
14 some quiet in the room so I can ask questions?

15 -- Of your complaint, Mr. Armstrong, you say
16 that the cross-defendants intentionally,
17 oppressively and maliciously disclosed to
18 third persons confidential information
19 disclosed by cross-complaintant during
20 auditing, do you recall that?

21 A. Yes.

22 MR. FLYNN: Pleadings are
23 not evidence. So what?

24 MR. BLUMENSON: Can you

1 restrain yourself so I can ask another
2 question?

3 MR. FLYNN: Yes, but what
4 difference does it make?

5 MR. BLUMENSON: This isn't a
6 stage Mike, can you restrain yourself?

7 MR. FLYNN: Pleadings are
8 not evidence --

9 Q. Do you claim that your drug sale
10 history was one of these facts encompassed by
11 this paragraph 24 that was obtained from the
12 pre-clear files, and disclosed to third
13 persons?

14 MR. FLYNN: Been asked and
15 answered.

16 MR. BLUMENSON: It has not.

17 MR. FLYNN: Everything in
18 the P.C. files, everything that was disclosed,
19 in confidentiality within the Church.

20 Q. Who was given --

21 MR. FLYNN: The basis of our
22 Complaint is, you have the pre-clear files, so
23 you can just go and look.

24 Q. Do you have any knowledge of

1 particular information that was given to a
2 third person from your auditing files?

3 A. I have specific knowledge, yes.

4 Q. And, who was the first person given
5 any information from your auditing file?

6 A. Guardian's office, the attorneys
7 working for the organization, the office of
8 special affairs.

9 Q. I asked who was the first person.

10 A. Well, as far as I know the G.O.

11 Q. Who in the G.O. was given information
12 from your auditing file?

13 A. Molly Alverzo.

14 Q. That was in 1975?

15 A. 1977.

16 Q. And, did you speak to Molly Alverzo --

17 A. Listen here, no, the G.O. had my files
18 in '76 when I was locked up, for the three
19 weeks I was locked up in Fifield Manor. The
20 G.O. told me then, so that was Ann Snyder, she
21 was the one that told me. But, the violation
22 started at day one, right from the beginning
23 there were people who had the power to do it,
24 and actually did have their grubby little

1 hands on Gerald Armstrong's pre-clear folder
2 from day one. From day one, Mary Sue
3 Hubbard's order, you know, G.O. 121669 or
4 whatever it is existed prior to my getting
5 involved in Scientology, figure that one out.
6 So, yes, that organization with its tentacles,
7 and the guy up at the top with his tentacles
8 had their hands on my pre-clear folders, on my
9 thoughts, and used them to control me from day
10 one.

11 Q. And, you found out, first found out
12 that your auditing files were being looked at
13 by unauthorized third persons in 1975?

14 A. Again, well -- unauthorized by whom?
15 The organization authorizes everybody to look
16 at the damn thing. Unauthorized by me yes,
17 unauthorized from day one. L. Ron Hubbard is
18 unauthorized, the whole organization is
19 unauthorized.

20 Q. When was the first time that you found
21 out that auditing files were not confidential?

22 A. I guess the real hint was when I was
23 in the G.O., you know, I may have heard little
24 snippets here and there, because, you know,

1 you kind of hear things around. But, when it --
2 the first real inkling was in the G.O. when I
3 saw telex traffic going back and forth with
4 people's sexual problems, and that sort of
5 thing.

6 Q. What year was that?

7 A. 1975.

8 Q. Did your auditing file get conveyed to
9 any newspapers?

10 A. I'll have to think about that. You
11 guys have not produced all of the press
12 releases. But, I would say yes, Freedom,
13 absolutely, yes, Church of Scientology
14 California, Guardians Operation, yes, you got
15 it all.

16 Q. Was information from your P.C. files
17 published by any newspapers, magazine, or any
18 other media?

19 A. I don't know.

20 Q. You don't know of any such case?

21 A. No. In fact, that's one of my
22 concerns, is that I'm looking forward to the
23 day when I see it in glowing print.

24 Q. Were you told that unless you did

1 something, or didn't do something that the
2 contents of your auditing files would be
3 published?

4 A. Well, utilized against me, I don't
5 know what that means.

6 Q. Who told you that?

7 A. Let me read it.

8 Q. All right, let me rephrase the
9 question.

10 A. No, let me answer that first just so I
11 answer that question.

12 Q. If you're going to point to the
13 objection of July third, what I want to ask
14 -- the objection speaks for itself. Prior to
15 July 3, 1986, did anyone ever tell you that
16 you must do or not do something or your
17 auditing files would be released to non-Scientologists?

18 A. I don't think it was -- let me put
19 this on the record --

20 Q. It's on the record.

21 A. No, it isn't on the record --

22 MR. FLYNN: Let him answer,
23 be a little professional, then you can move to
24 strike or do whatever lawyers do. But, don't

1 engage in a rambling colloquy.

2 A. If Armstrong insists on making the
3 contents of these files a part of this case --

4 MR. FLYNN: May the record
5 reflect that Mr. Blumenson has given -- made
6 a demonstrable gesture to his opposing counsel
7 in the way of a clenched fist with the middle
8 finger --

9 MR. BLUMENSON: Clenched
10 fist --

11 MR. FLYNN: Did you do such
12 a thing?

13 MR. BLUMENSON: I did not
14 use a clenched fist.

15 MR. FLYNN: With the middle
16 finger above the clenched fist. Did you do
17 such a thing?

18 MR. BLUMENSON: Are you
19 referring to when I scratched my ear a minute
20 ago?

21 MR. FLYNN: Thank you for
22 the admission Mr. Blumenson.

23 A. The language -- at this point --

24 Q. That language --

1 A. No, no --

2 Q. If you want to introduce that as an
3 exhibit, let's introduce it as an exhibit.

4 A. Okay. Then you asked me about acts of
5 threat by that organization regarding the
6 utilization of pre-clear folders. I'll give
7 it to you right now. If Armstrong insists on
8 making the contents of these files a part of
9 this case by obtaining copies of them, if he
10 even looks at them. The last part, he even
11 looks at them --

12 Q. I'm withdrawing the question. There
13 is no question on the floor, and I don't want
14 to waste unnecessary time.

15 My new question is, other
16 than that objection which was filed in court,
17 were you ever threatened with the release of
18 your pre-clear files to the media, or to any
19 other organization unless you did or did not
20 do something?

21 MR. BLUMENSON: Please stop
22 laughing, Mike.

23 MR. FLYNN: I can't help it.

24 A. Yes.

1 Q. Tell me the first such instance?

2 A. Well, it began, I guess the threat
3 began the moment I decided to walk out the
4 door of Scientology.

5 Q. Who made the threat?

6 A. It is implicit in what I know of the
7 organization.

8 Q. Did anyone tell you that your auditing
9 files would be used against you prior to July
10 3, 1986, at that pleading filed in court?

11 MR. FLYNN: L. Ron Hubbard
12 said it in the Fair Game Doctrine.

13 MR. BLUMENSON: I'm not
14 asking you for the answer Mr. Flynn, you're
15 totally out of turn.

16 MR. FLYNN: He said it in
17 the Fair Game Doctrine, that's what the case
18 is all about.

19 Q. Do you wish to adopt your counsel's
20 answer?

21 A. Well, I will adopt it as a base for
22 perhaps the more comprehensive answer which I
23 can give.

24 Q. Now, I'd like you to tell me in your

1 you kind of hear things around. But, when it --
2 the first real inkling was in the G.O. when I
3 saw telex traffic going back and forth with
4 people's sexual problems, and that sort of
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22 concerns, is that I'm looking forward to the
23 day when I see it in glowing print.

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9 question.

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13 objection of July third, what I want to ask
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15 July 3, 1986, did anyone ever tell you that
16 you must do or not do something or your
17 auditing files would be released to non-Scientologists?

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19 this on the record --

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13 MR. BLUMENSON: I did not
14 use a clenched fist.

15 MR. FLYNN: With the middle
16 finger above the clenched fist. Did you do
17 such a thing?

18 MR. BLUMENSON: Are you
19 referring to when I scratched my ear a minute
20 ago?

21 MR. FLYNN: Thank you for
22 the admission Mr. Blumenson.

23 A. The language -- at this point --

24 Q. That language --

1 A. No, no --

2 Q. If you want to introduce that as an
3 exhibit, let's introduce it as an exhibit.

4 A. Okay. Then you asked me about acts of
5 threat by that organization regarding the
6 utilization of pre-clear folders. I'll give
7 it to you right now. If Armstrong insists on
8 making the contents of these files a part of
9 this case by obtaining copies of them, if he
10 even looks at them. The last part, he even
11 looks at them --

12 Q. I'm withdrawing the question. There
13 is no question on the floor, and I don't want
14 to waste unnecessary time.

15 My new question is, other
16 than that objection which was filed in court,
17 were you ever threatened with the release of
18 your pre-clear files to the media, or to any
19 other organization unless you did or did not
20 do something?

21 MR. BLUMENSON: Please stop
22 laughing, Mike.

23 MR. FLYNN: I can't help it.

24 A. Yes.

1 Q. Tell me the first such instance?

2 A. Well, it began, I guess the threat
3 began the moment I decided to walk out the
4 door of Scientology.

5 Q. Who made the threat?

6 A. It is implicit in what I know of the
7 organization.

8 Q. Did anyone tell you that your auditing
9 files would be used against you prior to July
10 3, 1986, at that pleading filed in court?

11 MR. FLYNN: L. Ron Hubbard
12 said it in the Fair Game Doctrine.

13 MR. BLUMENSON: I'm not
14 asking you for the answer Mr. Flynn, you're
15 totally out of turn.

16 MR. FLYNN: He said it in
17 the Fair Game Doctrine, that's what the case
18 is all about.

19 Q. Do you wish to adopt your counsel's
20 answer?

21 A. Well, I will adopt it as a base for
22 perhaps the more comprehensive answer which I
23 can give.

24 Q. Now, I'd like you to tell me in your

1 own words, and I'd like Mr. Flynn to restrain
2 himself, I would like to know who if anybody
3 threatened you with release of your auditing
4 files if you did not do something or did do
5 something?

6 A. The organizational policy, the
7 organizational structure, the hierarchy, L.
8 Ron Hubbard, through my knowledge of their
9 past acts and through the documentation which
10 I acquired existed as a real threat. And, I
11 understood their possession of those documents
12 to be a real threat, and I knew as abhorrent
13 as it was, and unconfrontable as it was, I
14 suspected and kind of hoped in my heart of
15 hearts that it wouldn't happen, but I
16 suspected that sooner or later I would see
17 something like this document. And, there it
18 is.

19 Q. And, that document is referring to the
20 July 3, 1986 document is the first time that
21 you know of auditing, what you believe is
22 auditing information being disclosed?

23 A. No.

24 Q. When, what is the first time.

1 MR. FLYNN: I think it's been
 2 asked and answered. Let's take a little break.
 3 We have not had a break yet this afternoon,
 4 it's quarter of four, we started at 2:00, I
 5 think we all deserve a little break.

6 MR. GELLER: I agree.

7 MR. BLUMENSON: All right,
 8 we'll be back here at five of.

9 (Break taken)

10 Q. Did you ever author a declare about
 11 anybody?

12 A. Author a declare, do you have a name?

13 Q. No, I'm just asking.

14 A. Well, I have no present time
 15 recollection of authorization of --

16 Q. Did you see any declares when you were
 17 in Scientology?

18 A. Yes.

19 Q. Countless times?

20 A. No, not countless.

21 Q. Over 100?

22 A. I can't give you a total number right
 23 now. I mean they definitely escalated toward
 24 the end of my period.

1 Q. When was the first time that you saw a
2 declare?

3 A. On the ship.

4 Q. At that time you knew that an S.P.
5 declare -- if an S.P. declare is issued that
6 there is an opportunity to request a committee
7 of evidence; does the person who is declared
8 have an opportunity to request a committee of
9 evidence?

10 A. I suppose that depends on the person.

11 Q. Did you request a committee of
12 evidence when you were declared?

13 A. No.

14 Q. Are S.P. declares culled?

15 A. Define that.

16 Q. Well, do they have to be reviewed by
17 somebody else than the author?

18 A. Well, mine was reviewed by John
19 Peterson.

20 Q. Well, is the the policy of Scientology
21 that declares have been to be looked at by
22 more than one person before they're issued?

23 A. No, L. Ron Hubbard's stuff was never
24 looked at other than by the typist, so I guess

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1 the typist -- so the answer to the question
2 is yes, unless it's one that he typed himself.

3 Q. And, in Scientology ideology or
4 doctrine, an S.P. declare is charges which may
5 or may not be refuted in a committee of
6 evidence, is that correct?

7 A. No. An S.P. declare is the
8 declaration of someone as a suppressive person.
9 It may or may not contain charges, but those
10 are incidental to the fact that the person has
11 been declared a suppressive person relative to
12 Scientology.

13 Q. What is the doctrinal reason for
14 having an S.P. declare as you learned when you
15 were on the boat?

16 A. Well, what L. Ron Hubbard says is
17 that's the -- I think he said something like,
18 that's the most humanitarian thing to do. I
19 think that the person can never come to his
20 senses if you don't declare them.

21 In fact, what a declare is
22 -- see there is a Scientological concept
23 called: wrong item. If you indicate a wrong
24 item to someone, right, the person will, if

1 it's a wrong item, dramatize the item. If
 2 it's a right item, the person will cease to
 3 dramatize that item. So, figure out -- they
 4 call me a suppressive person, I get that
 5 indication, that's a declaration, Gerald
 6 Armstrong is a suppressive person. Thereafter
 7 I didn't become, in their eyes, not a
 8 suppressive person. I continued to dramatize
 9 it. So, by definition, by the Hubbardian tech,
 10 I could not have been a suppressive person.
 11 So, it's in error.

12 Q. You say that when you learned on the
 13 ship, was that --

14 MR. BLUMENSON: What was
 15 that, Mike?

16 MR. FLYNN: That was a quick
 17 analysis of Hubbardian psychology, which kind
 18 of has that theme.

19 MR. BLUMENSON: Can you keep
 20 your analysis to yourself?

21 MR. FLYNN: I was just
 22 opening my eyes to it.

23 Q. When you were on the ship, you were
 24 told that S.P. declares were for humanitarian

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1 purposes?

2 A. Right.

3 Q. And, did you believe that?

4 A. God, I don't even know -- it's real
5 rough to question anything like that. See,
6 that's -- you're into that area which is
7 real important in understanding the control
8 mechanism for why someone would after seeing
9 one of these scurrilous documents stay in.
10 And, the reason is because they are so
11 scurrilous, the picture that is painted of
12 anyone who is declared a suppressive person,
13 is of some awful individual. So, someone else
14 seeing that document knows that, I'm not
15 committing crimes like that, I don't think
16 like that, I'm not that kind of a person. So,
17 he never thinks that that could apply to him.
18 Only when it happens to you do you realize, of
19 course, that's how they kept them all in. I
20 mean, that's why I continued, why I'd see a
21 suppressive person declared, but I'm given the
22 black P.R. campaign about how evil this guy is,
23 destructive of mankind, I mean that's the
24 picture that you are given in the S.P. declare.

1 Q. So, the theory is --

2 A. The theory is if you black P.R. the
3 guy enough, no one can perceive -- I mean
4 when you're inside Scientology you can never
5 perceive of yourself as doing something
6 destructive, to hurt the organization, to harm
7 L. Ron Hubbard, any of those things. So, you
8 cannot perceive that these things are going to
9 happen to you. It's the same explanation for
10 the culling in 1975.

11 Q. I'm not asking you about the culling --

12 A. That explains it.

13 Q. Yes, but let's try to limit to a
14 responsive answer. I'm not asking you about
15 culling now.

16 MR. FLYNN: Gerry, you
17 finish your answer and he can move to strike.
18 Go ahead and testify.

19 MR. BLUMENSON: Mike you
20 want to prolong this so unnecessarily, I
21 didn't have a single question here, this
22 question didn't concern culling, this question
23 concerned an S.P. declare. And, if you want
24 to prolong this deposition by, you know,

1 insisting that something about culling come in,
2 you know we're going to have to be here for
3 ages in the future with that kind of conduct.

4 MR. FLYNN: Would you let
5 him answer, please?

6 MR. BLUMENSON: If you
7 insist, go ahead. I will move to strike. But,
8 we're wasting time. It's obvious it's not
9 relevant to my question.

10 A. It's very relevant to the case.

11 Q. Yes, but my question is not about
12 culling.

13 A. It's relevant to the question, because
14 it has to do with that exact item, that
15 declare, and that -- the technique the black
16 P.R. technique which is run.

17 Q. I just asked you whether you believe --

18 A. 1975, I get an inkling of what's being
19 done, what's being done in the context of
20 suppressive persons. I know that I'm not
21 suppressive. How can I possibly be? I'm
22 dedicated, I worked day and night, I slaved
23 for this guy, I don't deviate from that path
24 at all.

1 Q. What is a suppressive person in
2 Scientology?

3 A. A suppressive person is someone so
4 labeled by L. Ron Hubbard.

5 Q. What does the ideology say a
6 suppressive person is, or what does the
7 doctrine say a suppressive person is?

8 A. Well, the doctrine said a suppressive
9 person is one of the two and a half percent
10 most evil persons on the planet, a psychotic,
11 truly insane, there's probably a number of
12 definitions.

13 Q. A definition of a suppressive person is
14 someone who will harm Scientology?

15 A. That's probably one of them.

16 Q. Were you taught that definition?

17 A. I was probably taught the whole --
18 you can't understand. As soon as you say the
19 word suppressive person that alters every
20 perception about that guy, because suppressive
21 person doctrine is the basis of Scientology,
22 Hubbard based the whole thing on that.

23 Q. You mean that Scientology could not
24 exist without differentiating between people

1 who would harm Scientology or people who would
2 help Scientology?

3 A. Well, let's put it this way,
4 Scientology as we know it without the fair
5 game cum suppressive person, so --

6 Q. My question was, does existence in
7 Scientology ideology depend on distinguishing
8 between suppressive persons who will harm
9 Scientology, and others who will help
10 Scientology?

11 A. Well, you're into the definition of
12 Scientology.

13 Q. Well, you said that all of Scientology
14 depends on suppressive person declares. I
15 want to know what that means.

16 A. What it means is that when someone up
17 at the top of the organization doesn't like
18 someone down at the bottom of the organization,
19 they declare them a suppressive person and
20 gets rid of them, that's what it is.

21 Q. Do you know who declared you a
22 suppressive person?

23 A. Well I suppose -- I mean the order
24 came from Terry Gamboa. In fact the grand

1 order comes from L. Ron what's his name.

2 Q. Well, the order to name you as a
3 suppressive person came from Terry Gamboa?

4 A. Well, Terry ordered -- and the only
5 information that I have on that is on
6 admission by you people within the B-1 file.
7 That's the way it went. Okay, so I know that.
8 That's the one fact that I have.

9 Your organization has failed
10 to produce all of these documents despite
11 orders, relating to the suppressive person
12 declare, you've failed to produce those
13 documents, so all I have is that. The initial
14 order came from L. Ron Hubbard.

15 Q. What, the initial order to have S.P.
16 declares generally?

17 A. Well, if you take it back
18 philosophically, the creation of the
19 suppressive person idea, the creation of fair
20 game, the creation of the concept of enemies,
21 the creation of the operations, the creation
22 of the destruction, the creation of the policy
23 to ruin people utterly, borrowed from L. Ron
24 Hubbard, that's all from Hubbard.

1 Q. I'm asking about --

2 (Interruption)

3 Q. Do you believe that L. Ron Hubbard
4 himself, individually ordered you to be named
5 as a suppressive person, or did the order that
6 you in particular be named come from somebody
7 else?

8 A. Well, the specific order that I know
9 came at least from Terry. Terry of course is
10 the surrogate, if you want to call it, the
11 quasi, you know, the L. Ron Hubbard. So, you
12 know, they're acting by policy, you know the
13 messengers act for Hubbard. So, we've that
14 link.

15 Q. Terry Gamboa is your former wife?

16 A. Yes.

17 Q. Is an S.P. declare supposed to warn
18 Scientologists to stay away from the S.P., is
19 that one of it's functions?

20 A. Yes, one of it's functions.

21 Q. And, is the ideology that the rank and
22 file understand that this person is going to
23 be harmful to the Church?

24 A. I hesitate to get into what the rank

1 and file understands.

2 Q. But, when you were in --

3 A. I'll give you what the understanding
4 is. The rank and file seeing that document
5 understand that Gerald Armstrong is evil
6 beyond belief, and that it therefore is
7 totally acceptable behavior to, yes, cut off
8 all communications with him, but more than
9 that, do what thou wilt.

10 MR. FLYNN: Off the record.

11 (Discussion held off the
12 record.)

13 Q. So, an S.P. declare warns people who
14 are in the Church, warns Scientologists that
15 the S.P. is a threat to the Church?

16 A. I don't know if only construed like
17 that. It certainly brings up hatred towards
18 the individuals. So, I guess you can't have
19 hatred without threat, right? So, I guess,
20 yes, sure, those people are viewed as threats
21 and hated, yes.

22 Q. When you were on the ship, did you
23 believe that people who were declared were
24 threats to the existence of the Church?

1 A. Did I believe --

2 Q. Did you think that they were threats
3 to the Church?

4 MR. FLYNN: If you can
5 remember what you thought at the time, right?
6 That's your question, what he thought at that
7 point in time?

8 MR. BLUMENSON: Uh huh.

9 A. Well, my guess right now is upon
10 seeing these things I would have felt like
11 there was a threat which has now been caught,
12 and there is no way we can be threatened
13 because we're the only hope mankind has, and
14 we're incredibly dedicated.

15 Q. You mean by the acts of declaring the
16 person, S.P., that threat is removed?

17 A. Well, I think, you know, that's part
18 of the -- I mean, clearly it's an instrument
19 to create hatred toward the individual. The
20 form that that takes in the persons mind, in
21 my mind I suppose, it always seemed like this
22 was a tremendous kind of revelation. Like
23 we've now found the reason why it's been so
24 difficult all of this time. Each time there

1 would be a new, you know, this week it's Otto
2 Roos, and we got rid of the S.G's and, it's
3 just going to be wonderful. It's Wayne
4 Elkhart, it's Rudy Savage, it's this guy, it's
5 that guy. They come and they go. They're
6 declared suppressives, and the situation
7 doesn't change.

8 Q. Is an S.P. declare a way that the
9 absence of someone is explained to the people
10 who remained? I mean, I'm asking -- I'm
11 asking based on what you said.

12 A. The absence o someone?

13 Q. When someone disappears, is an S.P.
14 declare, is one of the purposes of S.P.
15 declare to explain why he is gone to the
16 people who remain?

17 MR. FLYNN: You mean to
18 explain why things have gone wrong?

19 Q. To explain why the person is no longer
20 there.

21 A. Well, I suppose that, you know, those
22 that I've seen have been probably connected to
23 the individual. So, I knew faces. But, I
24 don't know that -- you know, the suppressive

1 person declares, if that was true, then
2 suppressive person declares would be isolated
3 down to the immediate area. You know, why is
4 Joe missing today. Oh, here's the explanation.
5 That would make sense.

6 But, if Joe is in Los
7 Angeles, and the suppressive person declare
8 goes to every continent internationally, it's
9 hardly to explain why Joe isn't there.

10 Q. Who is a suppressive person declare --
11 let's put it this way, who saw this
12 suppressive person declare about you, to your
13 knowledge?

14 A. Well, I know that it was disseminated --

15 MR. FLYNN: Which one, the
16 first one or the second one?

17 MR. BLUMENSON: Either of
18 them, both of them.

19 A. I know that it was disseminated within
20 the Los Angeles Organization and the
21 Clearwater Organization, and I'm not totally
22 sure, but I believe it definitely -- or I
23 believe it showed up in the U.K.

24 Q. In a Church?

1 A. Somewhere over there, you know, it's
2 quite --

3 Q. You mean in an org. or a mission or a
4 Church or somewhere else?

5 A. As far as I know the dissemination of
6 it was acheived by the organization, to it's
7 own parishioners, to it's own membership, to
8 whatever they call them, to those people that
9 have to be convinced.

10 Q. To those people who have to be
11 convinced of what?

12 A. That Armstrong is evil.

13 Q. And, why does the organization feel
14 that it has to convince people that Armstrong
15 is evil?

16 A. Because of what he knows.

17 MR. FLYNN: About Ron.

18 Q. About what?

19 A. About L. Ron Hubbard, about the
20 organization's intent, about the activities of
21 the organization, about the violations of
22 pre-clear folders, of twelve and a half years
23 of perception, and realization, and
24 documentation of the fraud of L. Ron Hubbard

1 Scientology.

2 Q. So, when you say that an S.P. declare
3 is a way of eliminating a threat to the Church,
4 in your particular case would you say the S.P.
5 declare was the tool by which the things you
6 said would not be believed by the Church
7 membership, the things that you said about
8 Hubbard and the Church would not be believed?

9 A. Correct. That was certainly a part of
10 it, was to undermine those facts which I uncovered.

11 Q. And, the Church saw what you had as a
12 threat to, in fact, to their very survival,
13 isn't that true?

14 MR. FLYNN: You mean L. Ron
15 Hubbard's credibility? What do you mean by
16 very survival?

17 MR. BLUMENSON: To the
18 survival of the Church?

19 A. I can answer that.

20 MR. FLYNN: I object because
21 I don't know what survival of the Church means.

22 MR. GELLER: It's not
23 important, it's important that he does.

24 Q. Go ahead Gerry.

1 A. When you -- you know, let's call it
2 the organization, or let's call it Scientology,
3 but when we're talking about that and when
4 we're talking about those acts which have been
5 taken against Gerald Armstrong, we're talking
6 about the small group or the individual who
7 controls Scientology, and who calls all the
8 shots. That individual, that little power
9 group was what was threatened, no other
10 individual was threatened in any way. Those
11 people who had supreme power, and who had the
12 attendant supreme paranoia were convinced that
13 they were threatened.

14 Q. And, that's why the S.P. declare came
15 out?

16 MR. FLYNN: That's why the
17 policy exists.

18 Q. But, in your case, I just want to
19 narrow it to your case, that's why they
20 declared you an S.P. because you were a threat
21 to their survival, the inner circle survival?

22 A. Well, that's certainly a part of it.
23 It existed as a tool, it was a black P.R.
24 vehicle. It could upset Armstrong, it could

1 cut all of his communication lines. It was
2 just a part of the whole black propaganda,
3 operation Armstrong, operation destroy
4 Armstrong. It was just a piece of it.

5 Q. Because Armstrong was the most
6 significant threat that the Church faced at
7 that time?

8 MR. FLYNN: You mean in the
9 context of his prior answer?

10 Q. Yes. Did they view you as the most
11 significant threat?

12 MR. FLYNN: They being L.
13 Ron Hubbard and his immediate --

14 MR. BLUMENSON: Yes.

15 A. Well, when you say immediate --

16 MR. GELLER: He said
17 immediate.

18 MR. FLYNN: I said immediate,
19 meaning his power clique. He said immediate.

20 Q. Do you think that you were declared
21 because the people who declared you viewed the
22 dissemination of what you knew as a major
23 threat to their survival?

24 A. When we're talking about survival,

1 we're talking about survival of fraudulent
2 money making income power apparatus, that's
3 what was threatened, or what they conceived
4 was threatened. None of these individuals
5 -- I mean look at Gerald Armstrong, does
6 this guy threaten anyone? I mean I --

7 Q. What you term the power, and the
8 manipulation, and greed, and all that that you
9 see in the inner circle?

10 A. I threatened that.

11 Q. But, to put it in a more neutral term,
12 you threatened the division of authority
13 within the Church?

14 A. Division?

15 Q. The division of authority, the power
16 structure of the Church?

17 A. Well, you know, it's difficult for me
18 to give the specifics of what was in the mind
19 of those individuals.

20 MR. FLYNN: Will Rogers said
21 you can't threaten an honest man.

22 Q. Keep going.

23 A. So, knowing the policies and practices
24 of the organization for so many years, and

1 knowing the individual somewhat intimately on
2 top of it, that is L. Ron Hubbard, yes, he
3 viewed me as a serious threat.

4 Q. And, you were a threat to the belief
5 that L. Ron Hubbard was a super enlightened
6 individual, correct?

7 A. Well I was -- I mean it's not that
8 simple -- what I was a threat to was the myth
9 of L. Ron Hubbard, and the utilization of that
10 myth to control and obtain great wealth and
11 power from the people to whom the myth is is
12 being promulgated, I threatened that.

13 Q. Did you reveal the S.P. declare to any
14 persons?

15 A. Yes.

16 Q. And, who did you tell that to?

17 A. I told Joslyn, my friends, the press,
18 a lot of people.

19 Q. Would you say it was over 20?

20 A. Yes.

21 Q. Over 50?

22 A. I don't know. It may have been. I
23 testified about it in court, there is 50
24 people in court, there's been umpteen

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1 depositions in dozens of cases. It's come up
 2 time and time again. Yes, I have no problem
 3 with telling everyone that that litany of bullshit
 4 is the suppressive person declare.

5 MR. FLYNN: That's your
 6 safety.

7 MR. BLUMENSON: Please Mr.
 8 Flynn, you've done this consistently --

9 A. He was not feeding me answers, he has
 10 never fed me answers.

11 MR. FLYNN: Listen, it was a
 12 philosophical review, it really was.

13 Q. Did you ever hand out copies of the
 14 S.P. declare on you to any of the press or any
 15 others?

16 A. I don't recall if I did or not.

17 Q. You may have?

18 A. May have.

19 Q. Did you read sections of it to the
 20 press?

21 A. Well, if they were there, I probably
 22 gave them the document. You know, to me, at
 23 the time, 1982, this is a heavy document. Of
 24 course it's rather light in terms of what's

1 gone down since, but at that time it was a
2 mind blower.

3 Q. When you were in the Church, did you
4 believe S.P. declares, and committees of
5 evidence were a valid way to deal with
6 disloyal Church members?

7 A. I don't believe that I ever gave it
8 any thought, there was no other way.

9 Q. Okay. And, during the final days that
10 you were in the Church -- during the final
11 days that you were in the Church, did you know
12 that people were disenchanted with you, or
13 worried about you?

14 A. Disenchanted?

15 Q. Or worried?

16 A. Worried about me? I have difficulty
17 thinking that very few people worry about
18 anyone else. In there, that's a whole --
19 that's an idea that's on the outside.

20 Q. Did you know that there were people in
21 the Church who thought that you were a threat
22 to the Church during your final days at the
23 Church?

24 A. Well, I knew that Norman Starkey and

1 that little group at the top, Starkey
2 certainly ordered me sec. checked, and all I'm
3 doing is my job. And, his concern was that I
4 was giving the truth to Omar Garrison. So,
5 that certainly -- I mean, that was a mind
6 bending incident as well.

7 Q. Did you have some doubt about what
8 they were accusing you of prior to the S.P.
9 declare?

10 A. Doubt what they were accusing me of?
11 That makes no sense.

12 Q. Well, did you think there was any kind
13 of whispering campaign?

14 A. A whispering campaign?

15 MR. FLYNN: This is what the
16 whole other case was about, this
17 correspondence back and forth. There's hours
18 of testimony, Mr. Blumenson. This is all a
19 rehash.

20 A. A whispering campaign?

21 Q. Yes. Let me put it this way. Did you
22 ever ask them to come right out and tell you,
23 make accusations against you?

24 A. Well, I offered for Norman to come and

1 talk to me, but Norman declined, and I did not
2 stick around beyond a point of hopelessness.

3 Q. Is there ideology in Scientology that
4 before any other actions can be taken like in
5 a secular court there has to be an S.P.
6 declare?

7 A. What?

8 Q. Is there any such doctrine?

9 A. What?

10 Q. That the first step in the justice
11 system would be an S.P. declare?

12 A. Before a step can be taken in the
13 legal arena, so like you guys have got a case
14 against the F.B.I. so --

15 Q. Let's say a case against the Church of
16 Scientology?

17 A. Okay, and then the case against --
18 No, I can't say that is always the case. I
19 don't know. Allerd, who else have they
20 brought suit against? Do you mean that the
21 S.P. declare was the tip off that I should
22 have recognized that now they're going to
23 legitimize the lawsuit?

24 Q. I don't know the answer to the

1 question. I'm just asking.

2 When you asked to set up the
3 biography project --

4 A. Right.

5 Q. Who were you then -- and, your
6 request was accepted, correct?

7 A. Correct.

8 Q. And, who were you then employed by?

9 MR. FLYNN: That's the whole
10 other case, L. Ron Hubbard, that's what the
11 opinion says --

12 MR. BLUMENSON: I don't want
13 you to answer.

14 MR. FLYNN: This is outside
15 of the outline. The outline is supposed to
16 exclude prior cases I understand, that's what
17 the entire case is about.

18 MR. GELLER: You have a
19 Complaint in this case in your counter claim
20 for interference with contractual
21 relationship, right? So, how can Eric inquire
22 unless you let him go into this area?

23 MR. BLUMENSON: Are you
24 going to refuse that question to be answered?

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1 MR. FLYNN: Hold on one
2 second. You mean for breach? Now, the part
3 of allegation -- the part of Complaint that
4 we're talking about --

5 MR. BLUMENSON: You can
6 study your Complaint later. Make your
7 objection.

8 MR. FLYNN: I just want to
9 take a quick look at the Complaint.

10 MR. BLUMENSON: Make your
11 objection.

12 MR. FLYNN: Why don't you
13 just tell me quickly so we don't waste time.

14 MR. BLUMENSON: My question
15 is, who were you employed by after your offer
16 was accepted to work on the biography project?

17 A. L. Ron Hubbard.

18 Q. And, were you paid by L. Ron Hubbard?

19 A. Well, ultimately, yes. But --

20 Q. Was that officially your employer?

21 A. An official employer?

22 Q. Yes. I mean, who was the person who
23 was paying you? What was the organization
24 that was directly paying you?

1 A. Well, Sea Org. Reserves, whatever that
2 is, it's L. Ron Hubbard's --

3 Q. Did you consider yourself an employee
4 doing a job at that time?

5 A. Yes, you know, I guess so.

6 Q. And, were you employed -- did you
7 consider yourself an employee of a branch of
8 the Church of Scientology at the time.

9 MR. FLYNN: This is a
10 contract that he had with Hubbard.

11 MR. GELLER: Allegedly.

12 MR. FLYNN: That the Church
13 interfered with.

14 MR. BLUMENSON: Can I ask
15 some questions?

16 Q. Did you consider yourself employed by
17 the Church of Scientology in some fashion when
18 you were working on the biography project?

19 A. I used their facilities, but I was on
20 this Hubbard project.

21 Q. But, were you working on the Hubbard
22 project for the Church?

23 A. No. A differentiation was made
24 between so-called Church, and so-called

1 Hubbard staff. And, I was to be -- because
2 of the fact that I was making money directly
3 for L. Ron Hubbard, and working on his book, a
4 fact which the organization you will note
5 could not be involved -- you know, in this
6 C.S.C., C.S. whatever, to keep them, to give
7 the apparentness of distances between Hubbard
8 and the organization. I was to be Hubbard.

9 Q. Were you ever an employee of the
10 Scientologists as opposed to Hubbard?

11 A. You know, Hubbard is Scientology.

12 MR. FLYNN: Of the
13 Scientologists? What does that mean?

14 Q. Hubbard is Scientology?

15 MR. FLYNN: What does that
16 mean, of the Scientologists?

17 Q. Were you ever an employee of the
18 Church of Scientology?

19 A. Well, not in this sense that a person
20 is an employee of -- you know L. Ron Hubbard
21 ran it, he ran every detail. L. Ron Hubbard --

22 Q. L. Ron Hubbard ran the Church of
23 Scientology?

24 A. If we can agree that the alter ego

1 issue has been litigated, and L. Ron Hubbard
2 is the organization of Scientology --

3 MR. FLYNN: History.

4 A. Then I'll quit. But, that's the way
5 it was, L. Ron Hubbard ran it, I worked for L.
6 Ron Hubbard.

7 Q. All right, you say --

8 MR. BLUMENSON: Mike, come
9 on. Every question I ask you interject your
10 own opinions or answers, it's ridiculous.

11 MR. FLYNN: Only because
12 this has all been litigated.

13 MR. BLUMENSON: Well, you
14 can raise your objections simply, just like
15 the courts on many occasions have told you.
16 You don't have to make statements about the
17 answer should be or has been.

18 MR. FLYNN: Eric, we don't
19 want to relitigate what we did.

20 MR. BLUMENSON: I'm asking
21 on a good faith basis.

22 MR. FLYNN: I don't think so.

23 Q. When you say if the alter ego is
24 resolved one way, fine, you were an employee

1 of Scientology, if it isn't you were an
2 employee of L. Ron Hubbard, is that what you
3 said, is that what you meant?

4 A. I don't understand what you said.

5 Q. Were you working, during your time
6 from 1971 to 1981, during all of that time you
7 were an employee of someone's, right?

8 A. You know --

9 MR. FLYNN: This is what the
10 entire -- Hold it, hold it, time out. Mr.
11 Long was there, he can tell you, you can talk
12 to him, or you can go read the transcript.
13 This is what the first trial was all about.
14 As I understand it, it's supposed to be
15 excluded from the deposition testimony.

16 MR. BLUMENSON: Just raise
17 your objection, and then we'll litigate it
18 with the judge.

19 MR. FLYNN: We're departing
20 from the outline as we have throughout most of
21 the day.

22 MR. BLUMENSON: No --

23 MR. FLYNN: And, if you want
24 to waste your time in this way, Mr. Blumenson

1 you only have one minute left today.

2 MR. BLUMENSON: Why is that?

3 MR. FLYNN: It's almost 4:30.

4 I don't know if you were here, I told Mr.

5 Geller that we have to adjourn at 4:30.

6 Q. I want to know the answer to -- you
7 were the employee of someone from 1971 to 1981,
8 right?

9 A. Well, I was, there were times when it
10 was represented, and I was to represent that I
11 was an employee of Operation and Transport
12 Corporation, again, Hubbard owned O.T.C. so
13 it's Hubbard. For certain other reasons I was
14 not -- the Church of Scientology staff, but,
15 let me see, United Churchs until -- you know,
16 I went through various of these things until I
17 came on to the biography project. You see, I
18 was already Hubbard's personal staff, it's not
19 considered Church to use your term. The
20 differentiation was made even within the
21 organization. I was on what was called --
22 it was in what was called the household unit,
23 L. Ron Hubbard personal staff, working for
24 Hubbard. I transferred from there over to the

1 personal public relations office of L. Ron
2 Hubbard, likewise within what was known as the
3 personal office, the personal staff of L. Ron
4 Hubbard.

5 Q. Is that the L.R.H. personal office?

6 A. Didn't I just say that?

7 Q. That's what I'm asking you.

8 MR. FLYNN: It's 4:30.

9 MR. BLUMENSON: Wait.

10 MR. FLYNN: Put this in your
11 Mc Carthy file.

12 MR. BLUMENSON: One thing
13 we've got to do, which Mike Tabb promised that
14 we would do today --

15 MR. FLYNN: What's that?

16 MR. BLUMENSON: And that is,
17 a stipulation as to whether impotence would be
18 a damage in this case, or would be excluded
19 from the case. I asked if it was going to be
20 excluded, I didn't want to get into the issue,
21 if it wasn't going to be excluded, I would
22 have to get into it, obviously. He said that --

23 MR. FLYNN: Gerry, are you
24 impotent --

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1 A. Well, you know, can we do this outside
2 of the ears of the Court Reporter?

3 MR. BLUMENSON: We've got to
4 have it on the record.

5 A. I can answer.

6 MR. FLYNN: This is the area
7 we're going to let you go into. Go ahead.

8 A. I have within the Complaint nothing to
9 do with the loss of consortium. Okay.
10 Nothing about that. However, regarding the
11 situation which was created with my wife by
12 the operations of the organization, that
13 resulted in real difficulties between us.
14 Okay. So, if you want to get into the subject,
15 it's there for that reason. How it impacted
16 on my relationship with Joslyn, and the fact
17 that our relationship, our marriage culminated
18 in divorce. Subsequently, you know -- sex is
19 probably one of those things which is
20 connected to the human psyche, and mental
21 traits to some degree, and you know --

22 MR. FLYNN: Hopefully, for
23 procreation purposes.

24 A. Procreation purposes it can just be on

1 a chemical basis.

2 MR. FLYNN: I mean in order
3 to keep the species going.

4 A. But, certainly in terms of sexual
5 function or dysfunctions connected there
6 sometime. So, I cannot state that everything
7 is absolutely staggeringly wonderful all of
8 the time. However, I am not making any claim
9 that in any other relationship I've ever had
10 what Scientology has done has impacted on my
11 sexual function within those other
12 relationships. Are we clear on that?

13 MR. BLUMENSON: No, not at
14 all.

15 MR. FLYNN: I'm make it real
16 clear. It has to do with Joslyn and his
17 marriage only. We're making no claim outside
18 of that.

19 A. And, I'm not bringing up the subject.

20 MR. BLUMENSON: If you're
21 claiming that there was damage to Mr.
22 Armstrong's sexual abilities during the Joslyn
23 marriage, in that case, Mr. Tabb and I
24 stipulated last time that I would refrain from

1 asking until that was determined. Now that it
2 has been determined that you're claiming it as
3 a measure of damages, then you understand that
4 we'll have to resume the deposition on that
5 subject as well as these others.

6 MR. FLYNN: You have your
7 understandings, we have our understandings.
8 Hopefully someday there'll be a neutral --

9 MR. GELLER: Record should
10 reflect that they're walking out the door.

11 MR. FLYNN: It's 4:34 by my
12 watch.

13 MR. GELLER: At 4:34 they
14 have walked out the door.

15 (Deposition concluded at
16 4:35)

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1 COMMONWEALTH OF MASSACHUSETTS
2 COUNTY OF SUFFOLK

3
4
5 I, MICHELLE ROCK Certified Shorthand
6 Reporter and Notary Public in and for the
7 Commonwealth of Massachusetts, do hereby
8 certify that the foregoing deposition of
9 GERALD ARMSTRONG was taken before me on
10 October 30, 1986.

11 The said witness was duly sworn before
12 the commencement of his testimony; that the
13 said testimony was taken stenographically by
14 myself and then transcribed. To the best of my
15 knowledge, the within transcript is a true and
16 accurate record of said testimony.

17 I am not connected by blood or
18 marriage with any of the said parties, nor
19 interested directly or indirectly in the
20 matter in controversy.

21 In witness whereof, I have hereunto
22 set my hand and Notarial Seal this 5 day of
23 November, 1986.

24


NOTARY PUBLIC

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